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Attorneys for Plaintiff Taylor Thomson

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,

Plaintiff,

v.

PERSISTENCE TECHNOLOGIES BVI PTE
LTD., TUSHAR AGGARWAL, and ASHLEY
RICHARDSON,

Defendants.

Case No. 2:23-cv-04669-MEMF-MAR

**DECLARATION OF TODD HARRISON IN
SUPPORT OF PLAINTIFF'S *EX PARTE*
APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND ORDER TO
SHOW CAUSE FOR PRELIMINARY
INJUNCTION**

DECLARATION OF TODD HARRISON

I, Todd Harrison, declare as follows:

1. I am an attorney admitted pro hac vice to practice before this Court in the above-captioned matter. I am a partner with the law firm of McDermott Will & Emery LLP, attorneys of record for Plaintiff Taylor Thomson in the above-captioned matter. I make this declaration in support of Ms. Thomson's *ex parte* application for a temporary restraining order and order to show cause for preliminary injunction. I am familiar with the facts set forth herein and would competently testify thereto if called upon as a witness.

2. On October 30, 2024, I provided Defendant Ashley Richardson notice of Plaintiff Taylor Thomson's *Ex Parte* Motion for Temporary Restraining Order and Order to Show Cause for Preliminary Injunction via email.

3. Notice of the hearing date and time will be given to Defendant Ashley Richardson, when the date and time is set, and delivery of this motion and all supporting papers will be made immediately upon the filing of this motion.

4. Attached hereto as **Exhibit A**, are true and correct copies of screenshots of messages sent by Defendant Ashley Richardson to Plaintiff Taylor Thomson on October 13, 2024.

5. Attached hereto as **Exhibit B**, are true and correct screenshots of messages sent by Defendant Ashley Richardson to Madeleine Thomson on October 13, 2024.

6. Attached hereto as **Exhibit C**, are true and correct screenshots of messages sent by Defendant Ashley Richardson to Madeleine Thomson concerning Defendant's gun.

7. Attached hereto as **Exhibit D**, is a true and correct copy of the Request for Civil Harassment Restraining Order filed by Plaintiff Taylor Thomson in the Superior Court of California, County of Monterey on October 21, 2024.

8. Attached hereto as **Exhibit E**, is a true and correct copy of the Temporary

1 Restraining Order for Plaintiff Taylor Thomson against Defendant Ashley Richardson
2 issued by the Superior Court of California, County of Monterey on October 23, 2024.

3 I declare under penalty of perjury under the laws of the United States of
4 America that the foregoing is true and correct.

5 Executed this 30th day of October, 2024, in New York, NY.

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7 /s/Todd Harrison
8 Todd Harrison
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PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in Los Angeles, California. My business address is McDermott Will & Emery, LLP, 2049 Century Park East, Suite 3200, Los Angeles, CA 90067. I am over the age of eighteen years and not a party to this action.

On October 30, 2024, I served copies of the following document:

DECLARATION OF TODD HARRISON IN SUPPORT OF PLAINTIFF'S EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE FOR PRELIMINARY INJUNCTION

on the following parties via the CM/ECF Notice system:

Ashley Richardson
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Salinas, CA 93908
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Defendant in Pro Per

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New York, NY 10036

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on October 30, 2024 in Los Angeles, California.

/s/ Diksha Vadan
Diksha Vadan

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